

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JANE DOE ONE AND TWO,

Plaintiffs,

Case No. 13-14057

Hon.: Marianne O. Battani

Magistrate: Paul J. Komives

v.

VENIAMIN GONIKMAN, ALEKSANDR MAKSIMENKO,
MIKHAIL ARONOV, and BFC MANAGEMENT COMPANY
d/b/a ACE OF SPADES GENTLEMAN'S CLUB
f/d/b/a CHEETAH'S ON THE STRIP,

Defendants.

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DEFENDANT BFC MANAGEMENT COMPANY d/b/a
ACE OF SPADES GENTLEMAN'S CLUB f/d/b/a CHEETAH'S ON THE STRIP
ANSWER TO COMPLAINT, RELIANCE UPON JURY DEMAND, AND SPECIAL AND/OR AFFIRMATIVE
DEFENSES

NOW COMES Defendant BFC MANAGEMENT COMPANY d/b/a ACE OF SPADES GENTLEMAN'S CLUB f/d/b/a CHEETAH'S ON THE STRIP, only, by and through its attorneys, the **Law Offices of Mark A. Hypnar, P.C.** and for its Answer to the Plaintiffs Complaint states as follows:

PRELIMINARY STATEMENT

1. Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.
2. Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.
3. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this

Defendant, they are denied as untrue.

4. Defendant denies the allegations for the reason that they are untrue.
5. Defendant denies the allegations for the reason that they are untrue.
6. This Defendant denies the allegations as they pertain to it for the reason that they are untrue.
7. Defendant lacks sufficient knowledge and/or information sufficient to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

JURISDICTION AND VENUE

8. Defendant lacks sufficient knowledge and/or information sufficient to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.
9. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.
10. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.
11. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

12. Defendant admits that it is a Michigan corporation with its principal business in Detroit, Michigan. As to the remaining allegations, they are neither admitted nor denied Plaintiffs being left to their proofs.

13. The allegations contained in this paragraph are neither admitted nor denied Plaintiffs being left to their proofs.

PARTIES

14. Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

15. Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

16. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

17. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

18. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed

denied.

19. Defendant admits that it is a Michigan corporation with its principal place of business in Detroit. This Defendant further admits that it has done business under the name "Cheetahs on the Strip" and currently does business under the name "Ace of Spades". This Defendant further admits that a fire occurred at its business establishment. However, the Defendant neither admits nor denies the balance of the allegations as "the time of the events described above" in this paragraph are not disclosed or defined and as such they are deemed denied.

FACTUAL ALLEGATIONS

I. Recruitment and Trafficking to the United States

20. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

21. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

22. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

a. Jane Doe One

23. Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

24. Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

25. Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

26. Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

27. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

28. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

29. Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

30. Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

31. Defendant lacks sufficient knowledge and/or information to form a belief as to

the truth of such allegations, and therefore the allegations are deemed denied.

b. Jane Doe Two

32. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

33. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

34. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

35. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

36. Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

37. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this

Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

II. Involuntary Servitude, Forced Labor and Forced Sexual Services in the United States

38. Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

39. Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

40. Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

41. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

42. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

43. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

44. Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

45. Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

46. Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

47. Defendant denies the allegations as they pertain to it for the reason that they are untrue.

48. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

To the extent that the allegations infer that this Defendant forced the women to strip or provide lap dances, they are denied as untrue.

49. Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

50. Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

51. Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

52. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to

this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

53. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

III. Isolation in the United States

54. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

55. Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

56. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

57. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

58. No response is made to the allegations set forth in this paragraph as they are

inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

59. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

60. As to any of the allegations with respect to "Cheetah's on The Strip" they are denied for the reason that they are untrue. As to the remaining allegations, Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

IV. Methods of Control, Force, Intimidation and Coercion

a. Threats and Abuse

61. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

62. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

63. Defendant denies the allegations as they pertain to it for the reason that they

are untrue.

64. Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

65. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

66. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

67. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

68. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

69. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to

the truth of such allegations, and therefore the allegations are deemed denied.

70. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

71. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

b. Sexual Assault and Rape

72. Defendant denies the allegations as they pertain to it for the reason that they are untrue.

73. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

74. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

75. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this

Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

76. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

77. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

78. Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

79. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

V. **Jane Doe One's Escape and the Rescue of Jane Doe Two**

80. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

81. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

82. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

83. Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

84. Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

85. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

86. As to any of the allegations with respect to "Cheetah's on The Strip" they are denied for the reason that they are untrue. As to the remaining allegations, Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

87. Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

88. Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

89. Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

90. Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

91. Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

VI. Beauty Search Partners' Financial Gain

92. As to any of the allegations with respect to "Cheetah's on The Strip" they are denied for the reason that they are untrue. As to the remaining allegations, Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

93. As to any of the allegations with respect to "Cheetah's on The Strip" they are denied for the reason that they are untrue. As to the remaining allegations, Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

94. As to any of the allegations with respect to "Cheetah's on The Strip" they are denied for the reason that they are untrue. As to the remaining allegations, Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

95. As to any of the allegations with respect to "Cheetah's on The Strip" they are

denied for the reason that they are untrue. As to the remaining allegations, Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

96. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

VII. Defendant BFC's Involvement

97. Defendant denies as untrue the allegations set forth in this paragraph and further aver they are in inaccurate recitation of the quantum of proofs required to establish violations of the statutes alleged in the Complaint.

98. Defendant neither admits nor denies the allegations contained in this paragraph as the phrase "all relevant times" is not defined and the allegations are otherwise not factually accurate.

99. Defendant denies as untrue the allegations set forth in this paragraph and further aver they are in inaccurate recitation of the quantum of proofs required to establish violations of the statutes alleged in the Complaint.

100. Defendant denies as untrue the allegations set forth in this paragraph.

101. Defendant denies as untrue the allegations set forth in this paragraph.

102. Defendant denies as untrue the allegations set forth in this paragraph and further aver they are in inaccurate recitation of the quantum of proofs required to establish violations of the statutes alleged in the Complaint.

103. Defendant denies as untrue the allegations set forth in this paragraph.

104. Defendant denies as untrue the allegations set forth in this paragraph and further aver they are in inaccurate recitation of the quantum of proofs required to establish violations of the statutes alleged in the Complaint.

105. Defendant denies as untrue the allegations set forth in this paragraph.

106. Defendant denies as untrue the allegations set forth in this paragraph and further aver they are in inaccurate recitation of the quantum of proofs required to establish violations of the statutes alleged in the Complaint.

107. Defendant denies as untrue the allegations set forth in this paragraph.

108. Defendant denies as untrue the allegations set forth in this paragraph and further aver they are in inaccurate recitation of the quantum of proofs required to establish violations of the statutes alleged in the Complaint.

VIII. The Beauty Search Partners' Arrest and Conviction

109. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

110. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

111. No response is made to the allegations set forth in this paragraph as they

are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

112. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

113. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

FIRST CAUSE OF ACTION
Forced Labor Against All Defendants
(18 U.S.C. §§1589, 1595(a))

114. Defendant incorporates all of its previous responses to paragraphs 1-113 as if fully set forth herein.

115. Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

116. Defendant denies the allegations for the reason that they are untrue.

117. The allegations as to this Defendant are denied as untrue.

118. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to

the truth of such allegations, and therefore the allegations are deemed denied.

119. Defendant denies the allegations for the reason that they are untrue.

120. Defendant denies the allegations for the reason that they are untrue.

121. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

122. Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

123. Defendant denies the allegations for the reason that they are untrue.

SECOND CAUSE OF ACTION

Sex Trafficking By Force, Fraud or Coercion Against All Defendants
(18 U.S.C. §§ 1591, 1595(a))

124. Defendant incorporates all of its previous responses to paragraphs 1-123 as if fully set forth herein.

125. Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

126. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

127. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to

this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

128. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

129. Defendant denies the allegations for the reason that they are untrue.

130. Defendant denies the allegations for the reason that they are untrue.

131. Defendant denies the allegations for the reason that they are untrue.

132. Defendant denies the allegations for the reason that they are untrue.

THIRD CAUSE OF ACTION

Trafficking with respect to Peonage, Slavery, Involuntary Servitude or Forced Labor Against
Defendants Gonikman, Maksimenko, and Aronov
(18 U.S.C. §§ 1590, 1595(a))

133. Defendant incorporates all of its previous responses to paragraphs 1-132 as if fully set forth herein.

134. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

135. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to

the truth of such allegations, and therefore the allegations are deemed denied.

136. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

137. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

138. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

139. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

140. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

FOURTH CAUSE OF ACTION

Aiding and Abetting Violations of Forced Labor Against Defendant BFC Management

141. Defendant incorporates all of its previous responses to paragraphs 1-140 as if fully set forth herein.

142. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

143. Defendant denies the allegations for the reason that they are untrue.

144. Defendant denies the allegations for the reason that they are untrue.

145. Defendant denies the allegations for the reason that they are untrue.

146. Defendant denies the allegations for the reason that they are untrue.

FIFTH CAUSE OF ACTION

**Aiding and Abetting Violations of Sex Trafficking by Force, Fraud or Coercion
Against Defendant BFC Management**

147. Defendant incorporates all of its previous responses to paragraphs 1-146 as if fully set forth herein.

148. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

149. Defendant denies the allegations for the reason that they are untrue.

150. Defendant denies the allegations for the reason that they are untrue.

151. Defendant denies the allegations for the reason that they are untrue.

152. Defendant denies the allegations for the reason that they are untrue.

153. Defendant denies the allegations for the reason that they are untrue.

SIXTH CAUSE OF ACTION

Aiding and Abetting Violations of Trafficking with respect to Peonage,
Slavery, Involuntary Servitude or Forced Labor
Against Defendant BFC Management

154. Defendant incorporates all of its previous responses to paragraphs 1-153 as if fully set forth herein.

155. No response is made to the allegations set forth in this paragraph as they are inapplicable to this Defendant. To the extent the allegations can be construed to apply to this Defendant, this Defendant lacks sufficient knowledge and/or information to form a belief as to the truth of such allegations, and therefore the allegations are deemed denied.

156. Defendant denies the allegations for the reason that they are untrue.

157. Defendant denies the allegations for the reason that they are untrue.

158. Defendant denies the allegations for the reason that they are untrue.

159. Defendant denies the allegations for the reason that they are untrue.

160. Defendant denies the allegations for the reason that they are untrue.

WHEREFORE, this Defendant request that this Court dismiss the Complaint against it in its entirety and with prejudice, and award Defendant its costs and attorney fees wrongfully incurred in having to defend this action.

Respectfully Submitted,

Law Offices of Mark A. Hypnar, P.C.

By: /S/ Mark A. Hypnar (P32026)

P.O. Box 512

Bloomfield Hills, M. 48303

(248) 214-6644

mahypnar@aol.com

Dated: November 22, 2013

RELIANCE UPON JURY DEMAND

Defendant BFC MANAGEMENT COMPANY d/b/a ACE OF SPADES GENTLEMAN'S CLUB
f/d/b/a CHEETAH'S ON THE STRIP, through their counsel, hereby gives notice of its reliance
upon the Jury Demand filed in this cause.

SPECIAL AND/OR AFFIRMATIVE DEFENSES

Defendant BFC MANAGEMENT COMPANY d/b/a ACE OF SPADES GENTLEMAN'S CLUB
f/d/b/a CHEETAH'S ON THE STRIP, through their counsel, state the following Special and/or
Affirmative Defenses, some of which are alleged upon information and belief as there is
insufficient information known about the Jane Doe Plaintiffs, and others are alleged to avoid
waiver:

1. Some or all of the claims asserted in the Plaintiffs Complaint fail to state a claim
upon which relief can be granted.
2. Some or all of the claims asserted in the Plaintiff Complaint are barred by the
doctrine of unclean hands.
3. Some or all of the claims asserted in the Plaintiff Complaint are barred by the
doctrine of the wrongful conduct rule.

4. The circumstances upon which the claims are alleged are due to Plaintiffs' own actions or inactions and/or assumption of risk.

5. The circumstances upon which the claims are alleged are due to the actions, inactions or omissions of persons or entities other than this Defendant.

6. The claimed damages are speculative and too uncertain for any recovery.

7. Some or all of the claims are barred, in whole or in part, by the Plaintiffs acting in aiding, abetting, fraud, collusion and/or acting in a co-conspirator capacity with persons or entities other than this Defendant.

8. Some or all of the claims are barred by the doctrine of waiver.

9. Some or all of the claims are barred by the doctrine of laches.

10. Some or all of the claims are barred by the doctrine of the statute of limitations.

11. Some or all of the claims are barred by the doctrine of estoppel.

12. Some or all of the claims are barred by the Plaintiffs failure to mitigate damages.

13. Some or all of the claims or damages alleged are barred by the receipt of moneys from a collateral source or other restitution payments.

14. Defendant reserves the right file a motion to strike allegations in the Plaintiffs Complaint, pursuant to Fed.R.Civ.P. 12(f), that are redundant, immaterial, impertinent and/or scandalous or unnecessary to allege the necessary elements of the causes of action asserted.

15. Defendant reserves all affirmative defenses afforded under Fed.R.Civ.P 8(c) & 12(b).

16. Defendant reserves the right file a motion for more definite statement as to the particulars of the claims against this Defendant pursuant to Fed.R.Civ.P. 12(e).

17. In light of the fact that the Plaintiffs were allowed to proceed in this case under the pseudonyms of Jane Doe, and there is insufficient information known about them and the allegations alleged, Defendant reserves the right to assert other special and/or affirmative defenses as discovery progresses.

18. The Defendant reserves the right to challenges the Plaintiffs ability to proceed in this case under pseudonym names.

19. The Defendant reserves the right to challenge the applicability and/or retroactivity of the statutes allegedly violated in this action.

20. Because it is unclear from the allegations in Plaintiffs Complaint the exact time frames that the alleged statutory violations by this Defendant occurred, this Defendant reserves the right to assert the Constitutional 5th Amendment privilege protections afforded.

21. Because it is unclear from the allegations in Plaintiffs Complaint the exact time frames that the alleged statutory violations by this Defendant occurred, this Defendant reserves the right to seek a stay of proceedings until the expiration of the applicable statute of limitations governing the claims asserted by the Plaintiff in their Complaint.

22. Because it is unclear from the allegations in Plaintiffs Complaint as to the true identity of Jane Doe One and Jane Doe Two, the Defendant reserves the right to assert that these Plaintiffs claims for injuries and/or damages are barred, in whole or in part by release, satisfaction or accord.

23. Because it is unclear from the allegations in Plaintiffs Complaint as to the true identity of Jane Doe One and Jane Doe Two, the Defendant reserves the right to assert that these Plaintiffs claims for injuries and/or damages in this action may be barred by prior claims

or actions for the same or similar allegations in another court, venue or proceeding.

24. Defendant reserves the right to assert any defenses available to it under 18 U.S.C. §§ 1581 et seq. and 22 U.S.C. §§ 7101 et seq.

25. Defendant reserves the right to the right to amend and/or supplement these Special and/or Affirmative Defenses as discovery continues and through the time of trial.

Respectfully Submitted,

Law Offices of Mark A. Hypnar, P.C.

By: /s/ Mark A. Hypnar (P32026)

P.O. Box 512

Bloomfield Hills, M. 48303

(248) 214-6644

mahypnar@aol.com

Dated: November 22, 2013

CERTIFICATE OF SERVICE

The undersigned certifies that the following document(s) were served in the manner specified below:

DOCUMENTS: Defendant BFC Management's Answer to Complaint, Reliance upon Jury Demand, and Special and/or Affirmative Defenses.

DATE OF SERVICE: November 22, 2013

PERSON(S) SERVED: The Court and Counsel of Record

MANNER OF SERVICE: Via Federal ECF e-Filing System

By: /s/ Mark A. Hypnar
Mark A. Hypnar